

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**ANDREW ROBERT MCLELLAN FILE #1005360-1976:
d/b/a ANDREW ROBERT MCLELLAN**

CASE NO.: 24-12201 AMC

CHAPTER: 13

**ENTRY OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS, RECEIPT
OF NOTICES, AND INCLUSION OF NOTICE LIST**

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE enter the appearance of Edmund J. Campbell, Jr., Esquire on behalf of Deni Carise.

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, out client respectfully requests that all notices given in this case and in any adversary proceedings by the Court, the Debtor, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to the undersigned counsel at the addresses and to the persons, telephone numbers and telecopier set forth below. This request includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

Campbell Rocco Law, LLC
ATTN: Edmund J. Campbell, Jr. Esquire
2201 Renaissance Blvd. – 3rd Floor
King of Prussia, PA 19406
610-992-5885
Email: ecampbell@campbellroccolaw.com

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have orders in non-core matters entered only after de novo review by a District Judge, (ii) client's rights to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

Date: August 30, 2024

/s/ Edmund J. Campbell, Jr., Esq.
Edmund J. Campbell, Jr., Esq.
Court ID No. 63587

I hereby certify that copies of this Entry of Appearance were served by ECF notice (electronically) upon:

Assistant US Trustee:

United States Trustee
Robert N.C. Nix Federal Building
900 Market Street – Suite 320
Philadelphia, PA 19107

Trustee (if applicable):

Kenneth E. West
1234 Market Street – Suite 1813
Philadelphia, PA 19107

Navy Federal Credit Union
Attn: Tamy L. Terrell Benozza, Esq.
FEIN, SUCH, KAHN & SHEPARD, P.C.
7660 Imperial Way – Suite 121
Allentown, PA 18195